

7. Wire Fraud Schemes were fraudulent schemes in which perpetrators, using interstate and international wire communications and transmissions, obtained money and other things of value from victims through fraudulent pretenses.

8. A Romance Fraud Scheme was a type of Wire Fraud Scheme in which perpetrators, using assumed identities and other misrepresentations, formed close personal relationships with victims to gain victims' trust and then use that trust to obtain money and other things of value from victims. Perpetrators found victims on social media and other online platforms, such as online dating websites, and initiated relationships with victims based on false pretenses. The victims were often elderly individuals, and the personal relationships were often romantic in nature, but physically remote. Perpetrators often engaged in extensive intimate conversations with victims, including through telephone calls and text exchanges over email and messaging platforms, gaining victims' affection and trust. The perpetrators then requested money and other things of value from the victims under false pretenses, often claiming that the funds were for an urgent need (such as costs associated with a medical emergency), for furthering the relationship (such as travel costs for meeting in person), or for investment purposes (such as assisting the perpetrators in completing a lucrative transaction). Relying on those and other misrepresentations, perpetrators then convinced victims to send and transport money and other things of value, directing funds to be sent and transported to co-conspirators, often with those co-conspirators represented to be, and posing as, third parties.

COUNT 1

(Conspiracy to Commit Wire Fraud, 18 U.S.C. § 1349)

The Grand Jury charges:

9. The factual allegations contained in paragraphs 1 through 8 are re-alleged and incorporated as though fully set forth herein.

The Conspiracy and Scheme to Defraud

10. From in or around December 2017 through in or around March 2024, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendants OTUO AMPONSAH, ANNA AMPONSAH, HANNAH ADOM, PORTIA JOE, ABDOUL ISSAKA ASSIMIOU, and DWAYNE ASAFO ADJEL, and others known and unknown to the Grand Jury, did knowingly and intentionally combine, conspire, confederate and agree with each other to commit federal fraud offenses, that is: to knowingly, and with the intent to defraud, devise, and intend to devise, a scheme and artifice to defraud, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, knowing that the pretenses, representations, and promises were false and fraudulent when made, and, for the purpose of executing the scheme and artifice, to knowingly transmit and cause to be transmitted, by means of wire communication in interstate commerce, certain writings, signs, signals, pictures, and sounds, in violation of Title 18, United States Code, Section 1343.

The Objects and Purposes of the Conspiracy and Scheme

11. The objects and purposes of the conspiracy and scheme included, but were not limited to, the following: for the conspirators to unjustly enrich themselves by (a) persuading Wire Fraud Scheme victims to provide conspirators funds under false pretenses, (b) diverting proceeds for the conspirators' use and to further the conspiracy and scheme, and (c) concealing the conspiracy and scheme.

Manner and Means of the Conspiracy and Scheme

12. It was part of the conspiracy and scheme that:

a. Conspirators sought out victims for Wire Fraud Schemes, often targeting elderly individuals in the United States, and sought to obtain, and did obtain, funds from victims by means of false pretenses.

b. Conspirators contacted numerous victims through online dating websites and social media platforms for the purpose of engaging in Wire Fraud Schemes, including Romance Fraud Schemes.

c. Conspirators used false and fictional personas (the “Fraudulent Partners”) and other misrepresentations to engage in Romance Fraud Schemes with victims, establishing and developing close personal relationships with victims, often romantic in nature, through interstate and international wire communications.

d. After obtaining victims’ trust and affection by posing as Fraudulent Partners, conspirators sought to obtain money from victims, using false and fraudulent statements in interstate and international wire communications to induce victims to transmit funds to co-conspirators, including via wire transfer to, and deposits in, accounts controlled by co-conspirators.

e. Conspirators posed as third parties assisting victims’ Fraudulent Partners with investments or other transactions, so that victims would send them money, which was represented to be for the benefit of the Fraudulent Partners.

f. Conspirators shared in funds obtained from victims through the fraud, with conspirators providing a share of the funds they received to co-conspirators in Ghana and elsewhere.

All in violation of Title 18, United States Code, Section 1349.

COUNT 2

(Money Laundering Conspiracy, 18 U.S.C. § 1956(h))

The Grand Jury further charges:

13. The factual allegations contained in Count 1 are re-alleged and incorporated as though fully set forth herein.

14. From in or around December 2017 through in or around March 2024, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendants OTUO AMPONSAH, ANNA AMPONSAH, HANNAH ADOM, PORTIA JOE, ABDOUL ISSAKA ASSIMIOU, and DWAYNE ASAFO ADJEI, and others known and unknown to the Grand Jury, knowingly and intentionally combined, conspired, and agreed to commit offenses against the United States in violation of Title 18, United States Code, Sections 1956 and 1957, to wit:

a. to knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, which transactions involved the proceeds of specified unlawful activity, that is, Wire Fraud in violation of Title 18, United States Code, Section 1343, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i);

b. to transport, transmit, and transfer, and attempt to transport, transmit, and transfer a monetary instrument or funds involving the proceeds of specified unlawful activity, that is, Wire Fraud in violation of Title 18, United States Code, Section 1343, from a place in the United States to or through a place outside the United States, knowing that the funds involved in the transportation, transmission, and transfer represented the proceeds of some form of unlawful

activity and knowing that such transportation, transmission, and transfer was designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(2)(B)(i); and

c. to knowingly engage and attempt to engage, in monetary transactions by, through or to a financial institution, affecting interstate and foreign commerce, in criminally derived property of a value greater than \$10,000, that is, wire and other bank transfers, such property having been derived from a specified unlawful activity, that is, Wire Fraud in violation of Title 18, United States Code, Section 1343, in violation of Title 18, United States Code, Section 1957.

Manner and Means of the Conspiracy

15. It was part of the conspiracy that:

- a. Conspirators obtained proceeds of Wire Fraud Schemes, including Romance Fraud Schemes, targeted at victims across the United States.
- b. Conspirators, including in the Northern District of Ohio, opened and operated bank accounts to receive funds from victims, often under false pretenses, misrepresenting the purpose of the accounts as having legitimate business purposes.
- c. Conspirators, having received Wire Fraud Scheme proceeds, engaged in further transactions with those proceeds in order to return funds to co-conspirators through the domestic and international financial system while disguising the transfers as having legitimate business purposes, such as purchasing goods from foreign vendors, or other purposes.

d. Conspirators also retained and used for their own benefit a portion of the funds routed through their accounts as payment for helping to conceal and disguise the nature, location, source, ownership, and control of the funds received from Wire Fraud Scheme victims.

All in violation of Title 18, United States Code, Section 1956(h).

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.